



CIRCUIT COURT FOR MONTGOMERY COUNTY

50 Maryland Avenue, Rockville, Maryland 20850

Phone: (240) 777-9400 Maryland Relay call: 711

Toll-free (in Maryland) 888-287-0593

Case No. 478907-V

STATE OF MARYLAND

or

John Doe, et al.

Plaintiff

TO: Custodian of Medical Records

Name

Steven D. Shedlin, M.Ed. CRC

Address 1

One Research Court, Suite 450

Address 2

Rockville, Maryland 20850

City, County, State, Zip

vs. Montgomery County Board of Education, et al.

Defendant

Issue Date: 08/18/2020

Service Deadline: 60 days after Issue Date.

SUBPOENA

You are hereby compelled to appear at a ☐ court proceeding ☒ deposition at the following location:

120 East Baltimore Street, Suite 1850

Address of court or other location

Baltimore, Maryland 21202-1617

City, State, Zip

On September 22, 2020 at 9:00 ☒ a.m. or ☐ p.m.

Date

Time

☐ To testify in the above case, and/or☒ To produce the following documents, items, and information, not privileged:☒ To produce, permit inspection and copying of the following documents or other tangible items:

See attached Notice of Records Deposition Duces Tecum

Defendant

requested issuance of this subpoena. Questions should be referred to:

Requested By

Kevin Karpinski, Esquire, CPF #9312150114

Name

410-727-5000

Phone

120 East Baltimore Street, Suite 1850

Address

Baltimore, Maryland 21202-1617

City, State, Zip

Special Message:

- ☐ If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.
- ☒ If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s):
on the following date: by the following method (specified as required by Rule 2-126):

Signature

Printed Name

NON-EMERGENCY

CONFIDENTIAL

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY

JOHN DOE #1, *et al.* *

PLAINTIFFS *

v. *

CONSOLIDATED LEAD CASE NO.:

MONTGOMERY COUNTY BOARD
OF EDUCATION, *et al.* *

478907-V

* Judge Harry Storm

* * * * *

JOHN DOE #4, *et al.* *

PLAINTIFFS *

v. *

MONTGOMERY COUNTY BOARD
OF EDUCATION, *et al.* *

CASE NUMBER: 4478941V

*

* * * * *

NOTICE OF DEPOSITION DUCES TECUM

JOSEPH DOODY, one of the Defendants, by KEVIN KARPINSKI and KARPINSKI, CORNBROOKS & KARP, P.A., his attorneys, pursuant to the Maryland Rules of Civil Procedure, will take the deposition *duces tecum* of the following:

**Custodian of Records
Steven D. Shedlin, M.Ed. CRC
Rehabilitation Experts of Maryland, Inc.
One Research Court**

**Suite 450
Rockville, Maryland 20850**

on **Tuesday, September 22, 2020** at **9:00 a.m.** in the Office of Montgomery County Attorney, 101 Monroe Street, 3rd Floor, Rockville, Maryland 20850, before a Notary Public of State of Maryland. The deposition will be taken for the purpose of discovery, for use in evidence or for the preservation of testimony before a person authorized to administer an oath and shall continue from day to day until completed.

Deponent shall bring with him/her:

1. All letters, notes, facsimiles, e-mail, memoranda and/or other correspondence between Steven D. Shedlin, M.Ed. CRC, including any agent, servant, or employee of Steven D. Shedlin, M.Ed. CRC and/or any agent, servant or employee of Joseph, Greenwald & Laake, P.A., Ethridge, Quinn, Kemp, Rowan & Hartinger and/or Murphy, Falcon & Murphy, P.A. concerning the above-referenced litigation.

2. Any and all letters, notes, facsimiles, e-mail, memoranda, school records, medical records and/or other documents regarding Plaintiffs:

Joseph William McNeely
DOB: 12/2/2002
SSN: xxx-xx-5733

Mario Louis Tucker
DOB: 4/24/2004
SSN: Unknown

Samuel Aidan Allison
DOB: 9/26/2003
SSN: Unknown

George Joseph Boyce
DOB: 7/1/2004
SSN: Unknown

3. Any and all records, reports, preliminary reports, summaries, notes and/or other documents or materials which Steven D. Shedlin, M.Ed. CRC or any agent, servant or employee of Steven D. Shedlin, M.Ed. CRC prepared in connection with *John Doe, et al. v. Montgomery County Board of Education, et al.*, case number 478907-V.

4. A complete copy of Steven D. Shedlin, M.Ed. CRC's file concerning his investigation including, but not limited to, all information relied upon in support of each opinion to which Dr. Shedlin will testify at trial in *John Doe, et al. v. Montgomery County Board of Education, et al.*, including all reports, whether draft, interim or final, photographs, notes, charts, audio or video tapes, or other records, statements, correspondence, test procedures and test results, computer generated documents and memoranda.

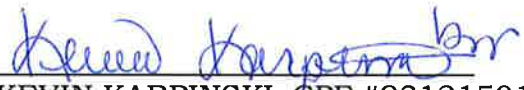
5. All client sheets, billing records or other documentation which reference or relate to all times Steven D. Shedlin, M.Ed. CRC has spent in any way investigating the claims against Montgomery County Board of Education, Casey B. Crouse, Vincent Colbert, Eric Wallich and Joseph Doody and/or the opinions he intends to express in *John Doe, et al. v. Montgomery County Board of Education, et al.*, case number 478907-V.

6. All correspondence and/or documents forwarded to Steven D. Shedlin, M.Ed. CRC from any source concerning the claims against Montgomery

County Board of Education, Casey B. Crouse, Vincent Colbert, Eric Wallich and Joseph Doody or the opinions Steven D. Shedlin, M.Ed. CRC intends to express at trial in *John Doe, et al. v. Montgomery County Board of Education, et al.*, case number 478907-V.

NO WITNESS NEED APPEAR FOR THE DEPOSITION IF COPIES OF THE REQUESTED DOCUMENTS ARE PROVIDED TO THE UNDERSIGNED COUNSEL ON OR BEFORE THE DEPOSITION DATE.

KARPINSKI, CORNBROOKS & KARP, P.A.

BY: 
KEVIN KARPINSKI, CPF #9312150114
120 East Baltimore Street
Suite 1850
Baltimore, Maryland 21202-1617
410-727-5000
Kevin@bkcklaw.com
Attorneys for Defendant Doody

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August 2020 a copy of the foregoing
was sent via email to:

Patricia Kane, Esquire
Chief, Litigation Division
Sean O'Hara, Esquire
Associate County Attorney
Jacquelyn Allen, Esquire
Associate County Attorney
Office of Montgomery County Attorney
101 Monroe Street, 3rd Floor
Rockville, Maryland 20850
***Counsel for Defendants Board of Education, Casey Crouse, Vinny Colbert
and Eric Wallich***

Timothy F. Maloney, Esquire
Matthew M. Bryant, Esquire
Alyse L. Prawde, Esquire
Joseph, Greenwald & Laake, P.A.
Suite 400
6404 Ivy Lane
Greenbelt, Maryland 20770
Counsel for Plaintiffs Doe 4 (478941V)

Thomas M. DeGonia, II, Esquire
Ethridge, Quinn, Kemp, Rowan & Hartinger
33 Wood Lane
Rockville, Maryland 20850

and

William H. Murphy, Jr., Esquire
Edward L. Cardona, III, Esquire
Malcum P. Ruff, Esquire
Murphy, Falcon & Murphy, P.A.
1 South Street, 30th Floor
Baltimore, Maryland 21202
Counsel for Plaintiffs Doe 1-3



Counsel for Defendant Doody

NON-EMERGENCY

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY

JOHN DOE #1, *et al.*

*

PLAINTIFFS

*

v.

*

CONSOLIDATED LEAD CASE NO.:

MONTGOMERY COUNTY BOARD
OF EDUCATION, *et al.*

*

478907-V

*

Judge Harry Storm

* * * * *

*

* * * * *

JOHN DOE #4, *et al.*

*

PLAINTIFFS

*

v.

*

MONTGOMERY COUNTY BOARD
OF EDUCATION, *et al.*

*

CASE NUMBER: 4478941V

*

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*

* * * * *

NOTICE OF SERVICE

I hereby that on this 18th day of August 2020, a copy of Notice of Deposition *Duces Tecum* to Dr. Shedlin and this Notice of Service were sent by first class mail, postage prepaid, to:

Patricia Kane, Esquire
Chief, Litigation Division
Sean O'Hara, Esquire
Associate County Attorney
Jacquelyn Allen, Esquire
Associate County Attorney
Office of Montgomery County Attorney
101 Monroe Street, 3rd Floor

Rockville, Maryland 20850

***Counsel for Defendants Board of Education, Casey Crouse, Vinny Colbert
and Eric Wallich***

Timothy F. Maloney, Esquire
Matthew M. Bryant, Esquire
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Counsel for Plaintiffs Doe 4 (478941V)

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Malcum P. Ruff, Esquire
Murphy, Falcon & Murphy, P.A.
1 South Street, 30th Floor
Baltimore, Maryland 21202
Counsel for Plaintiffs Doe 1-3

The original of said document will be retained by Defendant's counsel,
unaltered, until the time for an appeal has expired or until such time as this
case is dismissed.

KARPINSKI, CORNBROOKS & KARP, P.A.

BY:



KEVIN KARPINSKI

CPF #9312150114

120 East Baltimore Street

Suite 1850

Baltimore, Maryland 21202-1617

410-727-5000

Kevin@bkcklaw.com

Attorneys for Defendant Doody

NON-EMERGENCY

CONFIDENTIAL

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY

JOHN DOE #1, et al.

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PLAINTIFFS

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v.

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CONSOLIDATED LEAD CASE NO.:

MONTGOMERY COUNTY BOARD
OF EDUCATION, et al.

*

478907-V

*

Judge Harry Storm

* * * * *

JOHN DOE #4, et al.

*

PLAINTIFFS

*

v.

*

MONTGOMERY COUNTY BOARD
OF EDUCATION, et al.

*

CASE NUMBER: 4478941V

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* * * * *

**NOTICE IN COMPLIANCE WITH §4-306 OF THE HEALTH-GENERAL
ARTICLE, ANNOTATED CODE OF MARYLAND**

TO: All Counsel of Record

Take note that medical records concerning Plaintiffs have been subpoenaed
from the following medical facilities:

Brian Zimnitzky, M.D.
716 Giddings Avenue
Suite 33

Annapolis, Maryland 21401

Susannah Hughes, Ph.D., ABPP
8720 Georgia Avenue
Suite 606
Silver Spring, Maryland 20901

Steven D. Shedlin, M.Ed. CRC
Rehabilitation Experts of Maryland, Inc.
One Research Court
Suite 450
Rockville, Maryland 20850

Joshua Sussal, M.D.
Greater Washington Psychiatry and Counseling
3416 Olandwood Court, Suite 201
Olney, Maryland 20832

Dr. Haroldo Drachenberg
2915-C Olney Sandy Spring Road
Olney, Maryland 20832

Kim Wells, LCSW-C
Olney Counseling Center LLC
3300 Olney Sandy Spring Road, Suite 340
Olney, Maryland 20832

Dr. Erik Schobitz
Pediatric Emergency Department
Shady Grove Medical Center
9901 Medical Center Drive
Rockville, Maryland 20850

Richard Allen Lanham, Jr., Ph.D., L.P.
1924 Chapel Hill Road
Silver Spring, Maryland 20906

pursuant to the attached subpoena and §4-306 of the Health - General Article,
Annotated Code of Maryland. This Subpoena does seek production of ALL medical

records, including mental health records, if any.

Please examine these papers carefully. If you have any objection to the production of these documents, you must file a Motion for a Protective Order or a Motion to Quash the Subpoena issued for these documents under Maryland Rules 2-403, 2-510 or 4-266, no later than thirty (30) days from the date this Notice is mailed. For example, a protective order may be granted if the records are not relevant to the issues in this case, the request unduly invades your privacy, or causes you specific harm.

Also attached to this Notice is a copy of the Subpoena *Duces Tecum*, issued for these records.

KARPINSKI, CORNBROOKS & KARP, P.A.

BY:



KEVIN KARPINSKI

CPF #9312150114

120 East Baltimore Street

Suite 1850

Baltimore, Maryland 21202-1617

Kevin@bkcklaw.com

410-727-5000

Attorneys for Defendant Doody

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August 2020, a copy of the foregoing was sent by email to:

Patricia Kane, Esquire
Chief, Litigation Division
Sean O'Hara, Esquire
Associate County Attorney
Jacquelyn Allen, Esquire
Associate County Attorney
Office of Montgomery County Attorney
101 Monroe Street, 3rd Floor
Rockville, Maryland 20850
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33 Wood Lane
Rockville, Maryland 20850

and

William H. Murphy, Jr., Esquire
Edward L. Cardona, III, Esquire
Malcum P. Ruff, Esquire
Murphy, Falcon & Murphy, P.A.
1 South Street, 30th Floor
Baltimore, Maryland 21202
Counsel for Plaintiffs Doe 1-3



Counsel for Defendant Doody

Article - Health - General

§4-306.

(a) In this section, "compulsory process" includes a subpoena, summons, warrant, or court order that appears on its face to have been issued on lawful authority.

(b) A health care provider shall disclose a medical record without the authorization of a person in interest:

(1) To a unit of State or local government, or to a member of a multidisciplinary team assisting the unit, for purposes of investigation or treatment in a case of suspected abuse or neglect of a child or an adult, subject to the following conditions:

(i) The health care provider shall disclose only the medical record of a person who is being assessed in an investigation or to whom services are being provided in accordance with Title 5, Subtitle 7 or Title 14, Subtitle 3 of the Family Law Article;

(ii) The health care provider shall disclose only the information in the medical record that will, in the professional judgment of the provider, contribute to the:

1. Assessment of risk;
2. Development of a service plan;
3. Implementation of a safety plan; or
4. Investigation of the suspected case of abuse or neglect; and

(iii) The medical record may be redisclosed as provided in §§ 1-201, 1-202, 1-204, and 1-205 of the Human Services Article;

(2) Subject to the additional limitations for a medical record developed primarily in connection with the provision of mental health services in § 4-307 of this subtitle, to health professional licensing and disciplinary boards, in accordance with a subpoena for medical records for the sole purpose of an investigation regarding:

- (i) Licensure, certification, or discipline of a health professional; or
- (ii) The improper practice of a health profession;

(3) To a health care provider or the provider's insurer or legal counsel, all information in a medical record relating to a patient or recipient's health, health care,

or treatment which forms the basis for the issues of a claim in a civil action initiated by the patient, recipient, or person in interest;

(4) Notwithstanding any privilege in law, as needed, to a medical review committee as defined in § 1-401 of the Health Occupations Article or a dental review committee as defined in § 4-501 of the Health Occupations Article;

(5) To another health care provider as provided in § 19-308.2 or § 10-807 of this article;

(6) Subject to the additional limitations for a medical record developed primarily in connection with the provision of mental health services in § 4-307 of this subtitle and except as otherwise provided in items (2), (7), and (8) of this subsection, in accordance with compulsory process, if the health care provider receives:

(i) 1. A written assurance from the party or the attorney representing the party seeking the medical records that:

A. In a Child in Need of Assistance proceeding pursuant to Title 3, Subtitle 8 of the Courts and Judicial Proceedings Article, a person in interest has not objected to the disclosure of the designated medical records and 15 days have elapsed since the notice was sent;

B. In all other proceedings, a person in interest has not objected to the disclosure of the designated medical records within 30 days after the notice was sent; or

C. The objections of a person in interest have been resolved and the request for disclosure is in accordance with the resolution;

2. Proof that service of the subpoena, summons, warrant, or court order has been waived by the court for good cause; or

3. A copy of an order entered by a court expressly authorizing disclosure of the designated medical records; and

(ii) For disclosures made under item (i)1A of this paragraph, copies of the following items that were mailed by certified mail to the person in interest by the person requesting the disclosure at least 15 days before the records are to be disclosed:

1. The subpoena, summons, warrant, or court order seeking the disclosure or production of the records;

2. This section; and

3. A notice in the following form or a substantially similar form:

Plaintiffs

v.

Defendants

In the

For

Case No.: _____

NOTICE TO (Patient Name)
IN COMPLIANCE WITH § 4-306 OF
THE HEALTH – GENERAL ARTICLE,
ANNOTATED CODE OF MARYLAND

TAKE NOTE that medical records
regarding (Patient Name), have been
subpoenaed from the (Name and
address of Health Care Provider)
pursuant to the attached subpoena
and § 4-306 of the Health – General
Article, Annotated Code of Maryland.
This subpoena ____ does ____ does not
(mark one) seek production of mental
health records.

Please examine these papers carefully.
IF YOU HAVE ANY OBJECTION
TO THE PRODUCTION OF THESE
DOCUMENTS, YOU MUST FILE
A MOTION FOR A PROTECTIVE
ORDER OR A MOTION TO QUASH
THE SUBPOENA ISSUED FOR
THESE DOCUMENTS UNDER
MARYLAND RULES 2-403 AND
2-510 NO LATER THAN FIFTEEN
(15) DAYS FROM THE DATE THIS
NOTICE IS MAILED. For example, a
protective order may be granted if the
records are not relevant to the issues in
this case, the request unduly invades
your privacy, or causes you specific

harm.

Also attached to this form is a copy of the subpoena duces tecum issued for these records.

If you believe you need further legal advice about this matter, you should consult your attorney.

Attorney
(Firm Name
Attorney address
Attorney phone number)

Attorneys for (Name of
Party Represented)

Certificate of Service

I hereby certify that a copy of the foregoing notice was mailed, first-class postage prepaid, this ____ day of _____, 200_ to

Patient

Each Counsel in Case

Attorney

(iii) For disclosures made under item (i)1B of this paragraph, copies of the following items that were mailed by certified mail and by mail sent first-class postage prepaid to the person in interest and, if applicable, by mail sent first-class postage prepaid to the court and parties in a criminal or juvenile delinquency case by the person requesting the disclosure at least 30 days before the records are to be disclosed:

1. The subpoena, summons, warrant, or court order seeking the disclosure or production of the records;

2. This section; and
3. A notice in the following form or a substantially similar form:

_____	In the
Plaintiffs	_____
v.	For
_____	_____
Defendants	

Case No.: _____

NOTICE TO (Patient Name)
IN COMPLIANCE WITH § 4-306 OF THE HEALTH – GENERAL ARTICLE,
ANNOTATED CODE OF MARYLAND

TAKE NOTE that medical records regarding (Patient Name), have been subpoenaed from the (Name and address of Health Care Provider) pursuant to the attached subpoena and § 4-306 of the Health – General Article, Annotated Code of Maryland. This subpoena ____ does ____ does not (mark one) seek production of mental health records. Please examine these papers carefully. IF YOU HAVE ANY OBJECTION TO THE PRODUCTION OF THESE DOCUMENTS, YOU MUST FILE A MOTION FOR A PROTECTIVE ORDER OR A MOTION TO QUASH THE SUBPOENA ISSUED FOR THESE DOCUMENTS UNDER MARYLAND RULES 2-403, 2-510, or 4-266 NO LATER THAN THIRTY (30) DAYS FROM THE DATE THIS NOTICE IS MAILED. For example, a protective order may be granted if the records are not relevant to the issues in this case, the request unduly invades your privacy, or causes you specific harm. Also attached to this form is a copy of the subpoena duces tecum issued for these records. If you believe you need further legal advice about this matter, you should consult your attorney.

Attorney
(Firm Name
Attorney address
Attorney phone number)

Attorneys for (Name
of Party Represented)

Certificate of Service I hereby certify that a copy of the foregoing notice was mailed, first-class postage prepaid, this ____ day of _____, 20__ to

Patient

Each Counsel in Case

Attorney

(7) Subject to the additional limitations for a medical record developed primarily in connection with the provision of mental health services in § 4-307 of this subtitle, to grand juries, prosecution agencies, law enforcement agencies or their agents or employees to further an investigation or prosecution, pursuant to a subpoena, warrant, or court order for the sole purposes of investigating and prosecuting criminal activity, provided that the prosecution agencies and law enforcement agencies have written procedures to protect the confidentiality of the records;

(8) To the Maryland Insurance Administration when conducting an investigation or examination pursuant to Title 2, Subtitle 2 of the Insurance Article, provided that the Insurance Administration has written procedures to maintain the confidentiality of the records;

(9) To a State or local child fatality review team established under Title 5, Subtitle 7 of this article as necessary to carry out its official functions; or

(10) To a local domestic violence fatality review team established under Title 4, Subtitle 7 of the Family Law Article as necessary to carry out its official functions.

(c) When a disclosure is sought under this section:

(1) A written request for disclosure or written confirmation by the health care provider of an oral request that justifies the need for disclosure shall be inserted in the medical record of the patient or recipient; and

(2) Documentation of the disclosure shall be inserted in the medical record of the patient or recipient.

NON-EMERGENCY

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY

JOHN DOE #1, et al.

*

PLAINTIFFS

*

v.

*

CONSOLIDATED LEAD CASE NO.:

MONTGOMERY COUNTY BOARD
OF EDUCATION, et al.

*

478907-V

*

Judge Harry Storm

* * * * *

JOHN DOE #4, et al.

*

PLAINTIFFS

*

v.

*

MONTGOMERY COUNTY BOARD
OF EDUCATION, et al.

*

CASE NUMBER: 4478941V

* * * * *

NOTICE OF SERVICE

I hereby certify that on this 18th day of August 2020, a copy of Subpoenas, Notice of Compliance, §4-306 of the Health-General Article, Annotated Code of Maryland and this Notice of Service, were sent by email to:

Patricia Kane, Esquire
Chief, Litigation Division
Sean O'Hara, Esquire
Associate County Attorney
Jacquelyn Allen, Esquire
Associate County Attorney
Office of Montgomery County Attorney
101 Monroe Street, 3rd Floor

Rockville, Maryland 20850

***Counsel for Defendants Board of Education, Casey Crouse, Vinny Colbert
and Eric Wallich***

Timothy F. Maloney, Esquire

Matthew M. Bryant, Esquire

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Joseph, Greenwald & Laake, P.A.

Suite 400 - 6404 Ivy Lane

Greenbelt, Maryland 20770

Counsel for Plaintiffs Doe 4 (478941V)

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Ethridge, Quinn, Kemp, Rowan & Hartinger

33 Wood Lane

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Edward L. Cardona, III, Esquire

Malcum P. Ruff, Esquire

Murphy, Falcon & Murphy, P.A.

1 South Street, 30th Floor

Baltimore, Maryland 21202

Counsel for Plaintiffs Doe 1-3

The original of said document will be retained by Defendant's counsel,
unaltered, until the time for an appeal has expired or until such time as this case
is dismissed.

KARPINSKI, CORNBROOKS & KARP, P.A.

BY:

 bmr

KEVIN KARPINSKI

CPF #9312150114

120 East Baltimore Street

Suite 1850

Baltimore, Maryland 21202-1617

410-727-5000

Kevin@bkcklaw.com

Attorneys for Defendant Doody